

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEES

Graphic Packaging International, Inc.
Attn: Trent Carter
2333 South Wabash Avenue
Centralia, Illinois 62801

Application No.: 99100072

I.D. No.: 121802AAK

Applicant's Designation:

Date Received: May 23, 2008

Subject: Folding Carton Manufacturing

Date Issued:

Expiration Date:

Locations: 2333 South Wabash Avenue, Centralia, Marion County

This permit is hereby granted to the above-designated Permittees to OPERATE emission unit(s) and/or air pollution control equipment consisting of five (5) web non-heatset offset lithographic printing lines, ink mixing operation and eight (8) gluing machines pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source, to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirement to obtain a CAAPP permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304, and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 3a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK because flexographic and rotogravure printing presses are not used at this source.

- b. This permit is issued based upon the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. Pursuant to 40 CFR 63.3300(c), web coating lines in lithography, screenprinting, letterpress, and narrow-web flexographic printing processes are not part of the affected source of 40 CFR 63 Subpart JJJJ.
- c. This permit is issued based upon the ink mixing operation at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paints and Allied Products Manufacturing, 40 CFR 63 Subpart CCCCCC because the ink mixing operation does not processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
- 4a. This permit is issued based on coating operations performed on the web non-heatset offset printing lines not being subject to limitations of 35 Ill. Adm. Code 215.204(c) (Paper Coating). Pursuant to 35 Ill. Adm. Code 215.204(c), the limitations of 35 Ill. Adm. Code 215.204(c) shall not apply to equipment used for both printing and paper coating.
- b. This permit is issued based on the web non-heatset offset printing lines not being subject to 35 Ill. Adm. Code 215.408 (Heatset Web Offset Lithographic Printing) because the emissions of organic material from this source are limited below 100 tons/year.
- 5. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 6a. VOM usage and emissions from the plant (printing, ink mixing, gluing, and associated cleanup) shall not exceed the following limits.

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
8.0	90.0	8.0	90.0

These limits are based on actual emissions determined by maximum operation and material balance.

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.
- c. VOM and HAP emissions shall be determined from the following equation:

$$E = \sum (I_{Li} \times V_{Li} \times 0.05) + \sum (M_j \times V_{Mj})$$

Where

E = VOM/HAP Emissions (Ton);

I_{Li} = Lithographic Ink Usage (Ton);

V_{Li} = VOM/HAP Content of Lithographic Ink (Wt. fraction);

M_j = Other VOM/HAP-Containing Materials (Coatings, Adhesives, Clean-Up Solvents, etc.) Usage (Ton); and

V_{Mj} = VOM/HAP Content of Other Materials (Wt. fraction).

- d. Compliance with annual the limits of this permit shall be determined a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
7. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 8a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Names and amounts of all VOM/HAP-containing materials used (tons/month, tons/year);

- ii. VOM and HAP content of materials used (weight %); and
 - ii. Monthly and annual emissions of VOM and HAP from the source, with supporting calculations (tons/month, tons/year).
 - b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
 - 9a. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
 - b. Two (2) copies of required reports and notifications shall be sent to:
 - Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - Compliance Section (#40)
 - P.O. Box 19276
 - Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - 2009 Mall Street
 - Collinsville, Illinois 62234

It should be noted that this permit has been revised to reduce the number of gluing machines from nine to eight.

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If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Issued: _____

ECB:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the folding carton manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a source. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)		
		Single	Combined
	<u>VOM</u>	<u>HAP</u>	<u>HAP</u>
Printing, Ink Mixing, Gluing, and Associated Cleanup	90.0	7.9	19.9

VJB: